

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Alex Kadchnikov, Esq.
80-02 Kew Gardens Road, Ste 600,
Kew Gardens, NY 11415
Telephone: (718) 577-3261

In re:

TEUDY RAMIREZ

Debtor.

Chapter 13

Case No.

APPLICATION TO APPEAR *PRO HAC VICE*

Alex Kadchnikov, the movant (the “Movant”), a member in good standing of the bar of the U.S. District Court of the District of New Jersey, hereby moves the Court to enter an order permitting Vivian Sobers, Esq., to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey. In support of this Application, the Movant states as follows:

1. I agree to be responsible for the conduct of Ms. Sobers, and to ensure that she complies with the applicable rules.
2. The debtors have requested that Ms. Sobers represent them in this litigation. Ms. Sobers is familiar with the facts, issues, and pleadings in this action, and no delay in the discovery, motions, trial or any other proceeding will be occasioned by her *pro hac vice* admission in this matter.
3. For the reasons set forth in the accompanying Certification of Vivian Sobers, Esq., there is good cause for her *pro hac vice* admission.

4. On Ms. Sobers behalf, I hereby request that she receive notification via electronic mail of all electronic filings in the above captioned action by delivering such notification to the e-mail address vsobers@soberslaw.com.

5. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 9/12/22

Respectfully submitted,

By: /s/Kadochnikov

Alex Kadchnikov, Esq.
80-02 Kew Gardens Road, Ste 600,
Kew Gardens, NY 11415
(718) 577-3261

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

Alex Kadchnikov, Esq.
80-02 Kew Gardens Road, Ste 600,
Kew Gardens, NY 11415
(718) 577-3261

Chapter 13

Case No.

In re:
TEUDY RAMIREZ

Debtor.

**CERTIFICATION OF ALEX KADCHNIKOV IN SUPPORT OF THE
PRO HAC VICE ADMISSION OF VIVIAN SOBERS, ESQ.**

ALEX KADCHNIKOV, hereby certifies as follows:

1. I am an attorney-at-law in the State of New Jersey I am a member in good standing of the bar of the U.S. District Court of the District of New Jersey.
2. I make this Certification in support of the *pro hac vice* admission of Vivian Sobers, Esq. (“Sobers”), of Sobers Law, PLLC, 11 Broadway, Suite 615, New York, New York 10004.
3. I agree to be responsible for the conduct of Ms. Sobers, and to ensure that she complies with the applicable rules.
4. The debtor has requested that Ms. Sobers represent them in this litigation. Ms. Sobers is familiar with the facts, issues, and pleadings in this action, and no delay in the discovery, motions, trial or any other proceeding will be occasioned by her *pro hac vice* admission in this matter.
5. For the reasons set forth herein and in the accompanying Certification of Vivian Sobers, there is good cause for her *pro hac vice* admission.
6. On Ms. Sobers’ behalf, I hereby request that she receive notification via electronic mail of all electronic filings in the above captioned action by delivering such notification to the e-mail address vsobers@soberslaw.com.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: 9/12/22

/s/Kadochnikov

Alex Kadochnikov

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

Alex Kadochnikov, Esq.
80-02 Kew Gardens Road, Ste 600
Kew Gardens, NY 11415
Telephone: (718) 577-3261

Chapter 13

Case No.

In re:

Teudy Ramirez

Debtor.

VIVIAN SOBERS, ESQ. hereby certifies to the following:

1. I am a member in the law firm of Sobers Law, PLLC, a law firm with offices in New York, NY. My office is located at 11 Broadway, Suite 615, New York, New York 10004. I submit this certification in support of the request for my admission *pro hac vice* in this matter.

2. I am a member in good standing of the bar of the State of New York (admitted in 2012), and am admitted to practice before the U.S. District Court for the Eastern District of New York, U.S. District Court for the Southern District of New York, and for the U.S. District Court for the Northern District of New York.

3. The debtor has requested that I represent it in this matter.

4. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

5. I am familiar with the factual matters and legal issues related to this bankruptcy. Because of this, and because my practice is primarily in creditors' rights matters, I believe that there is good cause for my admission *pro hac vice*, and that my admission would further the interests of convenience and judicial economy and would minimize the expense of this matter.

7. I agree to:

- (a) Pay all required fees to the client security fund of the Bar of New Jersey pursuant to R. 1:28-2, and to the Clerk of the U.S. District Court pursuant Local Civil Rule 101.1(c)(3);
- (b) Abide by the applicable court rules;
- (c) Notify this Court immediately of any matter affecting my standing at the Bar of the State of New York, or of any other court to which I am admitted; and
- (d) Have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice law in New Jersey.

8. I hereby request receipt of notification via electronic mail of all electronic filings in the above captioned action by delivering such notification to the e-mail address vsobers@soberslaw.com.

9. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Dated: 9/12/22

/s/ Vivian Sobers
Vivian Sobers, Esq.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Case No.: _____

Adv. Pro. No.: _____

Caption in Compliance with D.N.J. LBR 9004-2(c)

, _____

Judge: _____

Chapter: 13

Alex Kadochnikov, Esq.
80-02 Kew Gardens Road, Ste 600,
Kew Gardens, NY 11415
Telephone: (718) 577-3261

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In Re:

TEUDY RAMIREZ

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is hereby **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 2090-1, and good cause having been shown; it is

ORDERED that Vivian Sobers, Esq. be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(4), ~~an appearance as counsel~~ of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of -state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of -state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC"

and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions;

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that I served a copy of this Order on the applicant and the Treasurer of the New Jersey Lawyers' Fund for Client Protection, Richard J. Hughes Justice Complex, P.O. Box 961, Trenton, NJ 08625-0961 on

JAMES J. WALDRON, Clerk